

1 **LAW OFFICES OF DALE K. GALIPO**
2 Dale K. Galipo, Esq. (SBN 144074)
3 dalekgalipo@yahoo.com
4 Marcel F. Sincich, Esq. (SBN 319508)
5 msincich@galipolaw.com
6 21800 Burbank Boulevard, Suite 310
7 Woodland Hills, CA 91367
8 Phone: (818) 347-3333 | Fax: (818) 347-4118

9 **LAW OFFICES OF GRECH & PACKER**
10 Trenton C. Packer (SBN 241057)
11 tpacker@grechpackerlaw.com
12 7095 Indiana Ave Ste 200
13 Riverside, CA 92506
14 Phone: (951) 682-9311

15 *Attorneys for Plaintiff EDGAR SOLIS*

16 ROB BONTA
17 Attorney General of California

18 DONNA DEAN
19 Supervising Deputy Attorney General

20 DAVID KLEHM
21 Deputy Attorney General

22 TAMMY KIM
23 Deputy Attorney General
24 600 West Broadway, Suite 1800
25 San Diego, CA 92101
26 P.O. Box 85266
27 San Diego, CA 92186-5266
28 Telephone: (619) 738-9567
Fax: (619) 645-2581
E-mail: David.Klehm@doj.ca.gov; Tammy.Kim@doj.ca.gov

15 *Attorneys for Defendant STATE OF CALIFORNIA and MICHAEL BELL*

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 EDGAR SOLIS,

19 Plaintiff,

20 v.

21 STATE OF CALIFORNIA; and
22 MICHAEL BELL.

23 Defendants.

24 Case No.: 5:23-cv-00515-HDV-JPR

25 [Honorable Hernán D. Vera]
26 Magistrate Judge Jean P. Rosenbluth

27 **SECOND AMENDED JOINT
28 EXHIBIT LIST**

29 **Trial:**

30 Date: February 18, 2025

31 Time: 09:00 a.m.

32 Place: Courtroom 10D

1 **TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEYS OF**
2 **RECORD:**

3 Plaintiff Edgar Solis and Defendants State of California and Michael Bell
4 hereby submit the following objections to exhibits which they may utilize during
5 trial. The parties reserve the right to supplement and/or amend these objections to
6 exhibits.

7
8 Respectfully Submitted,

9 DATED: February 14, 2025

LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER

10
11 By: /s/ *Marcel F. Sincich*
12 Dale K. Galipo
13 Marcel F. Sincich
14 Trent C. Packer
15 *Attorney for Plaintiff Edgar Solis*

16 DATED: February 14, 2025

17 ROB BONTA
18 Attorney General of California
19 NORMAN MORRISON
20 Supervising Deputy Attorney General

21
22
23
24
25
26
27
28 By: /s/ *David Klehm*
DAVID KLEHM
Deputy Attorney General
Attorneys for Defendants State of California (by
and through the California Highway Patrol) and
Michael Bell

OBJECTIONS TO EXHIBIT RE. JOINT EXHIBIT LIST

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
Photographs				
1.	Sgt. Paez Deposition Exhibit 1	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; impeachment of Defendant; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
2.	Sgt. Paez Deposition Exhibit 2	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE	FRE 801, Not hearsay; impeachment of Defendant; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	

¹ Plaintiff and Defendants reserve the right to object portion of documents listed in the following joint exhibit list that are objectionable pursuant to FRE 401, 403, 404, and 801.

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		602 & 611 speculation, lacks foundation.		
3.	Det. Sobaszek Deposition Exhibit 3	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
4.	Det. Sobaszek Deposition Exhibit 4	Objection. This is not an accurate depiction of the scene at the time of the incident and is a demonstrative exhibit not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801, Not hearsay; relevant to position of parties at the time of the shots fired; based on person knowledge of deponent.	
5.	Photographs of Off. Bell	Objection to the first two	Accurately depicts Defendant Officer	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 727, 729, 731)	paragraphs, AGO 727, AGO 729. FRE 403, unduly prejudicial, cumulative.	Bell and what he was wearing at the time of the incident.	
6.	Photograph of Off. Bell Gun (AGO 687)			
7.	Maps Marked by Officer Bell (AGO 335-336)	Objection. These markings on maps are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	FRE 801(d)(2)(a), Party opponent admission. Relevant to Defendant's testimony and claimed description of the incident.	
8.	Det. Sobaszek Deposition Exhibit 8			
9.	Photographs of Sgt. Paez (AGO 630, 750)			
10.	Photographs of Det. Sobaszek (AGO 643, 645)			
11.	Photographs of Dep. Waltermire (AGO 693, 698)			
12.	Photographs of Dep. Waltermire Gun (AGO 684)			
13.	Photographs of Stealth Explorer (AGO 530)			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
14.	Photographs of Green Mustang (AGO 547-48, 550, 552, 595)			
15.	Photographs of 633 Hillmer (AGO 658, 666)			
16.	Scene and Evidence Photographs (AGO 799, 800, 802, 805, 813, 816-17, 820, 852-53, 855, 857, 869, 874-75, 877, 881, 887-89, 891-92, 896, 901, 950, 953, 955-57, 960, 963, 965, 967-68, 970, 974-75, 978-79, 981, 986-87, 989, 991, 993-96, 1001, 1003-05, 1012, 1015, 1020, 1022, 1027-30, 1032, 1034-36, 1038, 1042-43, 1047-49, 1067, 1069, 1071, 1082-88, 1092-96, 1098, 1100-01, 1103-04, 1106, 1110, 1113, 1117-24, 1126, 1129-33, 1135, 1137, 1139, 1142-44, 1146, 1148, 1161, 1163, 1165-66, 1173-82, 1185-88, 1190-91, 1195, 1197-99, 1203-05, 1207-19)			
17.	(Reserved)			
18.	Photos of Plaintiff in Hospital			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(AGO 765-66, 1221-33)			
19.	Photographs of Plaintiff's Injuries (P 144, 416-20, 456, 478-79, 512, 2456-60, 5462, 5501-03, 5541-43)			
20.	Photographs of Edgar Solis (P 4064-4084)	FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Relevant to damages, not outweighed by prejudice; foundation to be given by Plaintiff.	
21.	(Reserved)			
22.	(Reserved)			
23.	GLA Investigation Scene Photographs (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701-704.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; no hearsay included; foundation given by Plaintiff's investigator who conducted the scene assessment.	
Videos				
24.	603 Hillmer Front Yard Video	Defendants reserve their right to object	Plaintiff reserves the right to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(relevant portions of AGO 504)	to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
25.	Screenshots from 603 Hillmer Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
26.	614 Hillmer Front Yard Video 1 (relevant portions of AGO 514)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
27.	Screenshots from 614 Hillmer Front Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
28.	614 Hillmer Back Yard Video 1 (relevant portions of AGO 524)	Defendants reserve their right to object to this exhibit because plaintiff has not provided	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		the “relevant portions” of this exhibit.	portions of videos as necessary based on testimony given.	
29.	Screenshots from 614 Hillmer Back Yard Video 1	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
30.	Deputy Waltermire BWC Video (relevant portions of AGO 506)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
31.	Deputy Waltermire Video 00:00-00:15			
32.	Deputy Waltermire Video 01:05-01:40			
33.	Deputy Waltermire Video 01:40-12:58			
34.	Screenshots from Deputy Waltermire BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
35.	Sergeant Paez BWC Video (relevant	Defendants reserve their right to object	Plaintiff reserves the right to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	portions of AGO 507)	to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
36.	Sergeant Paez Video 01:20-02:00			
37.	Sergeant Paez Video 02:00-06:13			
38.	Screenshots from Sergeant Paez BWC Video	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
39.	614 Hillmer Front Yard Video 2 (relevant portions of AGO 518)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
40.	Screenshots from 614 Hillmer Front Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
41.	614 Hillmer Front	Defendants reserve	Plaintiff reserves	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	Yard Video 3 (relevant portions of AGO 512)	their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
42.	Screenshots from 614 Hillmer Front Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
43.	614 Hillmer Back Yard Video 2 (relevant portions of AGO 519)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit relevant portions of videos as necessary based on testimony given.	
44.	Screenshots from 614 Hillmer Back Yard Video 2	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
45.	614 Hillmer Back Yard Video 3 (relevant portions of AGO 521)	Defendants reserve their right to object to this exhibit because plaintiff	Plaintiff reserves the right to respond. Plaintiff only plans to	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		has not provided the “relevant portions” of this exhibit.	admit relevant portions of videos as necessary based on testimony given.	
46.	Screenshots from 614 Hillmer Back Yard Video 3	Defendants reserve their right to object to this exhibit because plaintiff has not produced or identified the screenshots that comprise this exhibit.	Plaintiff reserves the right to respond. Plaintiff only plans to admit screenshots as necessary based on testimony given.	
Plaintiff's Medical Records				
47.	RUHS Medical Records (P 2,7-16, 18-35, 43-44, 67-81, 98-109, 117-26, 135-37, 144, 334-77, 408-11, 416-20, 438-41, 451-54, 456, 460-63, 467-70, 478-79, 483-86, 489-92, 496-99, 512, 517-19, 523, 529-32, 551-52, 609-11, 623, 625-62, 725, 728, 822, 936-37, 939, 2437, 2456-60, 2463, 2465, 2502, 2507, 2510, 2593, 2596, 2597)			
48.	Riverside Medical Records (P 2622, 2705, 2714-2718, 2738)			
49.	(Reserved)			
50.	High Desert Medical Records			

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	(P 2884)			
51.	CDCR Medical Records (P 4531, 4562, 4569, 5162-5164, 5210-12, 5215-16, 5225-26, 5228-5229, 5240-41, 5265, 5406-5409, 5431, 5444, 5450, 5362, 5501-03, 5541-43, 6567, 6591, 8896-8899)			
52.	AMR Records (selected from P 8890-8903)	FRE 403 FRE 403 unduly prejudicial. Plaintiff just produced these on September 20. Defendants have not had an opportunity to depose the third parties referenced in these records.	Plaintiff produced these records shortly after they were received. Defendants were on notice that there was emergency medical case, there is no prejudice suffered, yet highly relevant to damages.	
53.	High Desert Imaging (P 4085)			
54.	RUHS Imaging (P 4086)			
For Impeachment / Refresh Recollection / Demonstrative *				
55.	RCSD Report by Deputy Cline re 614 N. Hillmer Dr. (relevant portions of COR 1008-1031)	Defendants reserve their right to object to this exhibit because plaintiff has not provided the “relevant portions” of this exhibit.	For impeachment or to refresh recollection as indicated; relevant portions to be used as necessary based on testimony given.	
56.	Officer Bell CIIT	Objection.	For impeachment	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
	Statement (relevant portions of AGO 497)	Confidential compelled statement of a Law Enforcement Officer.	or to refresh recollection as indicated; does not qualify for a confidential designation.	
57.	Transcript of Officer Bell CIIT Statement (relevant portions AGO 68-161)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
58.	Officer Bell CHP Statement (relevant portions of AGO 500)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
59.	Transcript of Officer Bell CHP Statement (relevant portions AGO 162-192)	Objection. Confidential compelled statement of a Law Enforcement Officer.	For impeachment or to refresh recollection as indicated; does not qualify for a confidential designation.	
60.	Deputy Waltermire Statement (relevant portions of AGO 499)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
61.	Transcript of Deputy Waltermire Statement (relevant portions of AGO 193-248)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
62.	Officer Sobaszek Statement (relevant portion AGO 501)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
63.	Transcript of Officer Sobaszek Statement (relevant portions of AGO 294-300)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
64.	Sgt. Paez Statement (relevant portions of AGO 502)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
65.	Transcript of Sgt. Paez Statement (relevant portions of AGO 301-334)	Objection. Hearsay. Plaintiff has not shown the witness is unavailable to testify. FRE 801 hearsay.	For impeachment or to refresh recollection as indicated.	
66.	Demonstrative Yellow Dummy Gun	Objection This is a demonstrative exhibit not evidence. Untimely disclosure. LR 16-3. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Listed as demonstrative. Not hearsay. Not testimonial.	
67.	Demonstrative Fence	Objection. This is	Listed as	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		inflammatory and inaccurate. Objection This is a demonstrative exhibit not evidence. Untimely disclosure. LR 16-3. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	demonstrative. Not hearsay. Not testimonial.	
68.	Demonstrative Scene Assessment Measurements (produced in Expert Disclosures)	Objection to term Scene Assessment as these were not taken at the scene on the date of the incident. These are demonstrative exhibits not evidence. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701-704.	Relevant as accurate description of scene not provided by investigators reports; relevant and not hearsay as impeachment of Defendant Bell's testimony; foundation given by Plaintiff's investigator who conducted the scene assessment.	
69.	Demonstrative Maps	Untimely disclosure. These are demonstratives,	Defendants are not unduly prejudiced by Google maps	

Ex. #	Description	Objection ¹	Response to Objection	Date Admitted
		which were untimely disclosed, and not evidence. L.R. 16-3; FRCP 26; FRE 403 cumulative; FRE 611 speculation, lacks foundation.	images accurately depicting the scene as demonstrative evidence to orient the jury to the location of the incident.	

DEFENDANTS' ADDITIONAL EXHIBITS

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
100.	Composite Video 1 of Multiple individual homeowner videos and BWC videos	FRE 401, 403, 801; untimely, FRCP 26.	Timely disclosed in Parris Ward's expert report; no prejudice to Plaintiff; relevant; helpful to jury. This exhibit is simply a composite of the videos listed by Plaintiff and Defendants as separate exhibits.	
101.	Composite Video 2 of Multiple individual homeowner videos and BWC videos	FRE 401, 403, 801; untimely, FRCP 26.	Timely disclosed in Parris Ward's expert report; no prejudice to Plaintiff; relevant; helpful to jury. This exhibit is simply a composite of the videos listed by Plaintiff and Defendants as separate exhibits.	
102.	Critical Incident Investigation - C22-601-001 [AGO 1-7]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
			11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
103.	Summary of Incident [AGO 10-13]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008). Corroborates	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
			defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
104.	Scene Description [AGO 14]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
105.	Plaintiff's October 23, 2024, Deposition Exhibit 6-1.			
106.	Crime Scene Evidence Collection	P MIL 1. FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
	& Storage [AGO 43]	FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
107.	Injury Descriptions [AGO 44]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
108.	Plaintiff's October 23, 2024, Deposition Exhibit 2	Plaintiff restates and incorporates by reference all objections made therein. FRE 403.	Relevant and admissible as statement by party opponent, prior statement, and/or for impeachment. FRCP 33(c); FRE 801(d).	
109.	Maps [AGO 335-336]	FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i) and (iii).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1			Business Record. FRE 803(6)(B).	
2				
3				
4	110. [Reserved]			
5				
6	111. Photography and Video CONFIDENTIAL [AGO 368-376]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18	112. [Reserved]			
19				
20	113. Blood Alcohol Toxicology Report [AGO 392-394]	P MILs 1-4. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in	
21				
22				
23				
24				
25				
26				
27				
28				

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		possession of a firearm and narcotics. Also, is relevant to plaintiff's damages because a person who did not have methamphetamine and PCP in their body would most likely not have continued to evade and resist arrest after being shot with a .40 caliber bullet. Relevant to perception of events. (See Order on MILs, ECF 92)		
114.	Crime Scene logs [AGO 395-399]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
115.	Be On the Lookout Flier [AGO 450]	P MIL 1. FRE 801 hearsay.	Official Record. FRE 803(8)(A)(i)	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 speculation, lacks foundation.	and (iii). Business Record. FRE 803(6)(B).	
116.	[Reserved]			
117.	[Reserved]			
118.	Policy and Procedure Evaluation Report CONFIDENTIAL [AGO 488-496]	P MILs 1-5. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
119.	Hemet PD Dispatch CONFIDENTIAL .wav [AGO 498] INITIAL DISCLOSURES 1	P MILs 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	
120.	603 Hillmer.MOV	Duplicative of Exh.	May not be	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1	[AGO 504]	No. 24. FRE 401, 403, 801.	duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
2	121. 603 Hilmer- SPANISH.mp4 [AGO 505]	FRE 401, 403, 801.	Accurate depiction of the scene at the time of the incident.	
3	122. 2022-03-02_16-09-20.AVI [AGO 506]	Duplicative of Exh. No. 30. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
4	123. Axon_Body_3_Video_2022-03-02_1609_X6033338V.mp4 Footage from Hemet Police Department Sergeant Paez BWC [AGO 507]	Duplicative of Exh. No. 35. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
5	124. [Reserved]			
6	125. BKSJ2054.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 509] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police collecting evidence at the scene.	
7	126. [Reserved]			
8	127. [Reserved]			
9	128. [Reserved]			

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
129.	[Reserved]			
130.	KTKM2053.MP4 Front Yard Surveillance Videos Officer in Foot Pursuit Running Toward the Front of the Residence [AGO 514] INITIAL DISCLOSURES 2a	Duplicative of Exh. No. 26. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
131.	[Reserved]			
132.	LMQZ6399.MP4 Front Yard Surveillance Videos Officer Walking Through the Front Yard [AGO 516] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
133.	[Reserved]			
134.	MMXM3627.MP4 Front Yard Surveillance Videos Officers Running Towards the Shooting Scene with Multiple Guns Shots Heard [AGO 518] INITIAL DISCLOSURES 2a	Duplicative of Exh. No. 39. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff’s exhibit.	
135.	MRAK2661.MP4 Backyard Surveillance Videos Officers Talking in Backyard [AGO 519]	Duplicative of Exh. No. 43. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions”	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1	INITIAL DISCLOSURES 2b		of plaintiff's exhibit.	
2	136. NCWE2879.MP4 Backyard Surveillance Videos Officers Walking through Backyard [AGO 520] INITIAL DISCLOSURES 2b	FRE 401, 403, 801.	Accurately depicts the scene on the date of the incident showing the police response.	
3	137. NDBQ2555.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 521] INITIAL DISCLOSURES 2b	Duplicative of Exh. No. 45. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff's exhibit.	
4	138. [Reserved]			
5	139. [Reserved]			
6	140. UGGK1245.MP4 Backyard Surveillance Videos Officers with Guns Drawn and Instructing the Suspect to Drop the Gun. Multiple Gun Shots Heard [AGO 524] INITIAL DISCLOSURES 2b	Duplicative of Exh. No. 28. FRE 401, 403, 801.	May not be duplicative because plaintiff has not produced the “relevant portions” of plaintiff's exhibit.	
7	141. VVPM1227.MP4 Backyard Surveillance Officer is Heard Instructing the Suspect to Get on	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident and giving commands to	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1	2 the Ground [AGO 3 525] INITIAL 4 DISCLOSURES 2b		plaintiff.	
142.	[Reserved]			
143.	[Reserved]			
144.	[Reserved]			
145.	XMDR0023.MP4 Backyard Surveillance Video Officers Walking through the Backyard [AGO 529] INITIAL DISCLOSURES 2a	FRE 401, 403, 801.	Accurate depiction of the scene on the date of the incident.	
146.	OIS-655-03022022 Combined Photos 1 Subset CONFIDENTIAL [AGO 533, 535-536, 546]	P MILs 1-2. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
147.	OIS-655-03022022 Combined Photos 1 [AGO 547, 552, 564, 596, 598]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
148.	[Reserved]			
149.	OIS-655-03022022 Combined Photos 2 [AGO 645-648, 658, 662-666, 678]	FRE 401, 403.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
			FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
150.	[Reserved]			
151.	OIS-655-03022022 Combined Photos 3 [AGO 698-699, 701, 731-734]			
152.	[Reserved]			
153.	OIS-655-03022022 Combine Photos 4 Subset CONFIDENTIAL [AGO 763]	P MILs 1-2. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of Plaintiff's gun recovered from the scene on the date of the incident.	
154.	[Reserved]			
155.	[Reserved]			
156.	[Reserved]			
157.	[Reserved]			
158.	OIS-655-03022022 Combined Photos 6 [AGO 887-906, 909]	FRE 401, 403, cumulative, duplicative.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
159.	OIS-655-03022022	FRE 401, 403,	Official Record.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1	Combined Photos 7 [AGO 975, 977, 979, 981, 985, 993-1006]	cumulative, duplicative.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
2	160. OIS-655-03022022 Combined Photos 8 Subset CONFIDENTIAL [AGO 1009]		Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
3	161. OIS-655-03022022 Combined Photos 8 [AGO1014, 1030- 1031, 1033-1035, 1038, 1041-1042, 1045, 1066]	P MILs 1-2. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
4	162. OIS-655-03022022 Combined Photos 9 [AGO1087-1088, 1090, 1092, 1094- 1095, 1097, 1100- 1101, 1110, 1114, 1117-1119, 1121- 1122, 1125-1126, 1128, 1132, 1135,	FRE 401, 403, cumulative, duplicative.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
1137-1140, 1142-1145]				
163.	OIS-655-03022022 Combined Photos [AGO 1146, 1148]	FRE 401, 403, cumulative, duplicative.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
164.	OIS-655-03022022 Combined Photos 11 CONFIDENTIAL [AGO 1222, 1227]	FRE 403, cumulative, duplicative.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Accurate depiction of the scene on the date of the incident.	
165.	Michael Bell Training Records [AGO 1237-1273]	P MILs 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 602 & 611 lacks foundation.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
166.	CH1 HPM 70.6, Chapter 1 Use of Force [AGO 1274-1295]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
167.	LD20 TTS Training and Testing Specifications for Learning Domain #20 Use of Force/Deescalation, dated October 1, 2020 [AGO 1296-1304]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
168.	LD20-MOD 2 Use of Force Enforcement Tactics Unit Power Point[AGO 1305]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
169.	LD20-MOD 3 [AGO 1306]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
170.	LD20-MOD 4 [AGO 1307]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
171.	LD20-MOD 5 [AGO 1308]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
172.	LD20-MOD 6 [AGO 1309]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
173.	Deadly [AGO 1310]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
174.	Non-deadly [AGO 1311]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
175.	Media1.wmv - Training Video CHP Officers Gunned Down[AGO 1312].	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
176.	Media2.mwv – Training Video Keeping Safe Distance [AGO 1313].	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
177.	[Reserved]			
178.	Media4.wmv – Training Video Texas Police Dash Cam of Officer Pursuing Suspects Shot in Face [AGO 1315]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28,	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
179.	[Reserved]		2008).	
180.	[Reserved]			
181.	[Reserved]			
182.	[Reserved]			
183.	[Reserved]			
184.	[Reserved]			
185.	Media11.wmv - Training Video Oregon State Police Video Captures Fatal Freeway Shooting [AGO 1322]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
186.	Media12.wmv - Training Video Response to Burglary Call - Use of Deadly Force - [AGO 1323]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		701 & 702 improper opinion.	<i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
187.	Media13.wmv - Training Video Fleeing Suspect Shot[AGO 1324]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07- 873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
188.	[Reserved]			
189.	[Reserved]			
190.	[Reserved]			
191.	[Reserved]			
192.	[Reserved]			
193.	[Reserved]			
194.	[Reserved]			
195.	Media24.wmv – Training Video Has a Gun[AGO 1333]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
196.	[Reserved]			
197.	LD_20_V-5.3 [AGO 1335-1456]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
198.	LD20 ECO - (CTC I-20) [AGO 1457-1467]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown;	Official Record. FRE 803(8)(A)(i) and (iii). Business Record.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
199.	2nd Qtr A&C example block schedule [AGO 1468]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
200.	[Reserved]			
201.	UOF A&C Safety Policy_29582 [AGO 1470-1498]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant	Official Record. FRE 803(8)(A)(i) and (iii).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
202.	2022 UOF A&C POST Certified ECO [AGO 1480-1487]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Findings which dispute Plaintiff's expert's opinion that Officer Bell did not comply with CHP's Policies. <i>Phillips v. Bratton</i> , 2008 WL 11409876, at *10 (Case No. CV 07-873 CAS (VBKX), C.D. Cal. Jan. 28, 2008).	
203.	[Reserved]			
204.	[Reserved]			
205.	RCSD Report by Inv.	P MIL 1-2, 4.	Official Record.	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
206.	Moody re Tox Results for Edgar Solis; 04/12/22 [COR 000762-COR 000766]	FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics. Relevant. (See Order on MILs, ECF 92.)	
207.	[Reserved]			
208.	RCSD Report by Inv. Moody re Summary Report for Edgar Solis; 04/13/22 [COR 000963-COR 000965]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
		firearm and narcotics.		
209.	[Reserved]			
210.	RCSD Report by Inv. Moody re Suspect Gun Function Test; 05/19/22 [COR 000990-COR 000992]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE 701 & 702 improper opinion.	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B). Corroborates defendant Officer Bell's observations that plaintiff was actively resisting and evading arrest because plaintiff was aware that he would be sent back to prison due to being a felon in possession of a firearm and narcotics.	
211.	[Reserved]			
212.	[Reserved]			
213.	[Reserved]			
214.	[Reserved]			
215.	[Reserved]			
216.	[Reserved]			
217.	Jail Booking Info for Edgar Solis [COR 001072-COR 001073]	P MIL 1. FRE 801 hearsay. FRE 401 irrelevant info. unknown; FRE 403 unduly prejudicial, cumulative; FRE 404 impermissible character evidence; FRE 602 & 611 speculation, lacks foundation; FRE	Official Record. FRE 803(8)(A)(i) and (iii). Business Record. FRE 803(6)(B).	

<u>No.</u>	<u>Description</u>	<u>Objection</u>	<u>Response</u>	<u>Ruling</u>
2		701 & 702 improper opinion.		
3	218. [Reserved]			
4	219. [Reserved]			

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28